

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CASE NO.: 1:19-CV-09156 (LTS) (KHP)

- - - - - x

GRAHAM CHASE ROBINSON,

Plaintiff,

- against -

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

- - - - - x

ZOOM VIDEOCONFERENCE DEPOSITION OF  
ROBERT DE NIRO  
April 4, 2022

MAGNA LEGAL SERVICES  
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[www.MagnaLS.com](http://www.MagnaLS.com)

1 Q. What is Canal Productions?

2 A. It is a production company that I  
3 started many years ago.

4 Q. And what's your role at Canal  
5 Productions?

6 A. They loaned me out to other film  
7 companies when I'm working as an actor or  
8 director or whatever.

9 Q. Is it fair to say that you run Canal  
10 Productions?

11 A. You could say that, yes, of course.

12 Q. Have there ever been any written  
13 policies at Canal?

14 A. I don't think so, but there might  
15 have been. I don't really think so.

16 Q. Have you ever been interviewed by  
17 the police or any other law enforcement  
18 personnel?

19 MR. DROGIN: Objection to the  
20 form.

21 Go ahead and answer.

22 A. Something here or there, yes.

23 BY MR. SANFORD:

24 Q. Something here or there, what is  
25 that?

1 deposition?

2           A.     Nothing. Nobody feels like talking  
3 about it. It is just like -- it is like talking  
4 about something where you really -- it is sort  
5 of unsavory and so kind of low that you just say  
6 let's just move on.

7                     It is a low point in my life of  
8 having to be subjected to this kind of thing.  
9 If I deserve it, I deserve it, and I would be  
10 the first to say it.

11                    If I don't deserve it, you can't  
12 blame me for feeling a little annoyed by all of  
13 this.

14                    I tried to do the best thing for  
15 Chase. I do what you call the honor system. Do  
16 the right thing by me; I do the right thing by  
17 you. Don't shake me down, don't threaten me,  
18 try to intimidate me.

19                    This is to me a pathetic situation  
20 that we're all going through and a lot of -- and  
21 a big waste of time and money.

22                    So you can't blame me for being  
23 annoyed.

24           Q.     Do you know that Dan Harvey was  
25 deposed in this matter?

1 MR. SANFORD: Can we do that,  
2 please.

3 (Whereupon, an audio  
4 recording was played.)

5 MR. SANFORD: For the record, we  
6 began playing the recording at the time  
7 stamp of 118, and we're marking the  
8 document as Plaintiff's Exhibit 110.

9 (Recording was marked as  
10 Plaintiff's Exhibit 110 for  
11 identification, as of this date.)

12 BY MR. SANFORD:

13 Q. Mr. De Niro, do you recognize your  
14 voice on that recording?

15 A. Yes, I do.

16 Q. Would you consider yourself hostile  
17 on the recording?

18 A. I was angry, yes, I was angry.

19 Q. Why did you say what you said in  
20 that voice-mail?

21 A. Because that's what she did. I was  
22 accommodating her. She's living in Spain. She  
23 lives in London. She works from there. She  
24 does this and that. Then I hear later that  
25 she's using Ubers and staying in hotels, my

1 here.

2 I knew she would keep that thing and  
3 use it today and I would be sitting in the  
4 situation I am right now hearing that. I knew  
5 that, but I was so angry.

6 I said listen, fuck it. I'm going  
7 to say this. You were wrong. You know, you  
8 claim that you work so hard. You do all this,  
9 you do all that. I started questioning whether  
10 she really did do as much as she said she did.

11 Q. You approved her work from Spain,  
12 didn't you?

13 A. Well, I -- listen, I wanted to make  
14 her happy. I figured if she wants to go there,  
15 she has a reason. If she can do it with the  
16 internet and so on, I'm okay with that.

17 I'm not the kind of boss, if you  
18 will, that says you have to stay here 9 to 5,  
19 all that stuff. I believe in letting people do  
20 what they want to do as long as they do their  
21 job.

22 And if they don't do their job,  
23 then, look what happens. I mean, I was -- even  
24 then I forgive them.

25 I said, "Just don't do it again.

1 Thank you for copping to not doing what you  
2 should not have done." That's all. That's all  
3 I ask. Be honest about what you did wrong. You  
4 screwed up. Fine, say it, and then we move on.  
5 People make mistakes.

6 And that's how, that's how you  
7 create loyalty with people. By understanding  
8 that it is okay if you make a mistake.

9 But what I don't like is what this  
10 woman is doing to me right now. She tried to  
11 shake me down for \$600,000. She wrote a fake  
12 letter to the London School of Economics which  
13 couldn't have been used for any kind of job, and  
14 I knew that and I was not going to sign it.

15 I do the right thing by my  
16 employees. You have spoken to other ones. I  
17 don't -- the most I ever get is annoyed by  
18 something. I don't abuse them. I don't do  
19 anything. I don't curse at them. I don't do  
20 anything.

21 MR. DROGIN: Can we move on with  
22 the questions?

23 A. I have my trainer. Dan Harvey is  
24 with me almost 40 years. I have other people  
25 working with me for long periods of time.

1           Q.    I asked you what qualities you  
2   valued in Ms. Robinson.  You talked about  
3   arrogance and petulance and bullying.

4                    I'm wondering if those are the  
5   qualities that you, in fact, valued?

6           A.    No, I didn't, no, I didn't.  I  
7   didn't value -- you mean -- I'm not  
8   understanding.  You're saying I valued?

9           Q.    Valued.  Do you know what it means  
10   to value a quality?

11          A.    No, I didn't value those qualities  
12   if she had them.  And I saw them later on.  I  
13   tolerated them.

14          Q.    Okay.

15                   So what qualities did you value of  
16   Ms. Robinson?

17          A.    I thought she was a good worker.  
18   She kept saying she was a good worker.  She kept  
19   doing that.  When I called her and asked her to  
20   do something, she had it done.  She knew she had  
21   to have it done.  That was all fine.

22                   As time went on, she would get --  
23   you know, she would take liberties with doing  
24   this or choosing something.  You don't need  
25   that.  I'll take this.



1                   And I would say that's a little -- I  
2   don't know, it is a little forward, but I'll let  
3   it go because, you know, people get their  
4   little -- they get a little eccentric, a little  
5   crazy.

6                   You have to tolerate people's  
7   foibles. That's okay. That's life. You can't  
8   get rid of them for that. You know, that's  
9   okay. They have good qualities that outweigh  
10  those qualities. I'll tolerate those.

11                  Q.    What are the qualities --

12                  A.    She led me to believe she was doing  
13  everything that I asked her to do. A lot of  
14  times she hired good people. She interviewed  
15  them and then we would get them. They were the  
16  people I have now. Sabrina especially is  
17  terrific.

18                  So Chase did that. She does good  
19  things. I was not, I -- in fact, I was so busy  
20  that I wasn't, you know -- just do what it is  
21  and no problem. Let's move on.

22                  There's no -- I wasn't asking her to  
23  do things that were hard or so hard. And she  
24  ran the office. She was the point person. I  
25  need this, so she'll delegate to whomever it

1 said no, no, they need them first. I rather pay  
2 for her. Then let the kids -- whatever is the  
3 best. But I didn't want all the air miles to be  
4 used by her, and I didn't even know how many air  
5 miles I had.

6 But I trusted her to allot to  
7 herself the amount of air miles she would need  
8 for her work.

9 Q. We're going to talk about that.  
10 We're going to talk about air miles. Let me ask  
11 you this.

12 You say that she was your point  
13 person. What does it mean to be your point  
14 person?

15 A. Do you have a head person in your  
16 office --

17 Q. My question --

18 A. -- who does everything?

19 Listen, okay. A point person is  
20 your main person with you who does -- maybe it  
21 is the lead assistant or -- she is my head  
22 assistant.

23 She is the person that delegates all  
24 the things to be done in the office and doles  
25 out, if you will, the assignments for certain

1 things so I don't have to go to each person and  
2 say you do this, you do that.

3 That is what that was. She had a  
4 lot of control.

5 Q. So she controlled delegating  
6 assignments and she was that point person  
7 throughout the time she had worked for you?

8 A. Yes, pretty much, yes.

9 Q. All right.

10 During her employment -- during  
11 Ms. Robinson's employment at Canal, how many  
12 times would you communicate with her during an  
13 average day?

14 MR. DROGIN: Objection to form.

15 A. A few times.

16 THE WITNESS: Sorry.

17 MR. DROGIN: Objection to the  
18 form.

19 You can answer.

20 BY MR. SANFORD:

21 Q. You can answer.

22 A. I would be talking to her a lot  
23 during the day. How is this? How is that? She  
24 would call me, e-mail. This is being done, dah,  
25 dah, dah. You know, it was just the usual

1 stuff.

2 Q. How frequently would you text  
3 Ms. Robinson during an average day?

4 A. I don't remember. You know, I don't  
5 remember.

6 Q. How often would you meet with  
7 Ms. Robinson in a typical day?

8 A. It could be once a day. Sometimes  
9 not for a day or two or three if I'm busy doing  
10 something other than just being out of town.

11 Q. During Ms. Robinson's employment at  
12 Canal, Ms. Robinson generally kept you apprised  
13 of where she was throughout the course of a day,  
14 didn't she?

15 MR. BENNETT: Objection.

16 A. I think she probably did, but I'm  
17 not a hundred percent sure. Sometimes she  
18 didn't. But I would just rely on her. I would  
19 call her or say call me and that would be that.

20 BY MR. SANFORD:

21 Q. It was common for you and  
22 Ms. Robinson to speak early in the morning  
23 before 9:00 a.m., right?

24 A. I think yes --

25 MR. BENNETT: Objection.

1           A.    I think in the beginning of the day,  
2    yes.

3    BY MR. SANFORD:

4           Q.    And it was common for Ms. Robinson  
5    to do work for you early in the morning as well,  
6    right?

7                   MR. BENNETT:  Objection.

8           A.    At times.

9    BY MR. SANFORD:

10          Q.    And it was common for you and  
11    Ms. Robinson to speak late at night until 8:00  
12    o'clock or later, right?

13                  MR. BENNETT:  Objection.

14          A.    It could be.

15                  THE WITNESS:  I'm sorry, should I  
16    not answer?  Or are you saying  
17    objection?

18                  MR. BENNETT:  It's okay, Bob, go  
19    ahead.  I'll be very clear if I don't  
20    want you to answer.

21    BY MR. SANFORD:

22          Q.    And it was common for you and  
23    Ms. Robinson or Ms. Robinson to speak with you  
24    and do work on the weekends, right?

25                  MR. BENNETT:  Objection.

1           A.     Yes, if need be, yes.

2       BY MR. SANFORD:

3           Q.     And it was common for you and  
4       Ms. Robinson to speak on holidays, right?

5                   MR. BENNETT:  Objection.

6           A.     If need be, yes.

7       BY MR. SANFORD:

8           Q.     And during Ms. Robinson's employment  
9       at Canal, Ms. Robinson kept you apprised if she  
10      was going to be away from New York, right?

11                   MR. BENNETT:  Objection.

12           A.     Yes, she said she would like to go  
13      to Spain or London and do this, and I -- you  
14      know, with the internet and technology these  
15      days, I said okay.  Even phones, okay.  
16      That's -- I want to accommodate her.  I want to  
17      make her happy.  I just -- that's how I am.

18                   If people want to do something, they  
19      need to do it that way.  I'll say okay.  I'm  
20      okay with that as long as you do what you need  
21      to have done.

22       BY MR. SANFORD:

23           Q.     Ms. Robinson checked with you before  
24      traveling from New York, going outside of New  
25      York, right?

1 MR. BENNETT: Objection.

2 MR. DROGIN: Objection to the  
3 form.

4 You can answer.

5 A. Well, she had to tell me that she is  
6 going out. You know, that would be -- of course  
7 she would have to tell me.

8 BY MR. SANFORD:

9 Q. And even if Ms. Robinson was  
10 traveling away from New York, Ms. Robinson was  
11 still available to work for you, right?

12 MR. BENNETT: Objection.

13 MR. DROGIN: Objection to the  
14 form.

15 You can answer.

16 BY MR. SANFORD:

17 Q. I couldn't hear.

18 A. That was the understanding. That is  
19 the absolute understanding. Not when she's  
20 traveling. Maybe even then, you know, if she  
21 had WiFi on the plane or something and I need to  
22 get her a message before she landed say  
23 wherever, in London, or whatever, if there was  
24 WiFi on an international flight. Rarely that  
25 would happen. You know, whatever.

1           Q.    And you would get upset if  
2   Ms. Robinson was not available when you called  
3   her, wouldn't you?

4           A.    No, I wouldn't get upset.   Only if  
5   she was supposed to be available.

6                    This wasn't a regular occurrence.  
7   What happened on that recording was not a  
8   regular occurrence.   She did get back to me.  
9   She knew that she had to, that I needed to do  
10   something.   So, you know, there was no, you  
11   know --

12           Q.    Can you describe for me the types of  
13   things that Ms. Robinson did to assist you and  
14   your family while she was employed at Canal?

15                   MR. DROGIN:   Objection to the  
16                   form.

17                   You can answer.

18           A.    Well, she would help me get  
19   presents.   We would go to stores, pick out this  
20   with a list; this for this child, this for that,  
21   this relative.   You know, everything, just to  
22   try and cover all that.   She would go with me  
23   and we would do all that.

24                   You know, that stuff she would do  
25   and stuff with the family.   I need this or that.



1 Yes, she is a personal assistant. She also was  
2 very important as far as helping me with those  
3 things.

4 BY MR. SANFORD:

5 Q. So besides getting presents and  
6 going to stores, what else would she do?

7 A. Well, you know, whatever,  
8 whatever -- she helped me with the house. She  
9 pulled in a friend of hers. I said fine, an  
10 interior designer.

11 We would go to the design center or  
12 here and there, look for furniture. Order  
13 furniture to certain specifications. She helped  
14 me with this, a piece of furniture. Be there  
15 waiting when it would come in, or somebody --  
16 she would have Michael there waiting for when it  
17 would come in.

18 You know, it was anything. Anything  
19 and everything.

20 Q. Okay.

21 Ms. Robinson's titles changed at  
22 various times during her employment at Canal,  
23 didn't they?

24 A. At her request.

25 MR. SANFORD: We are sharing a

1 what there is. And at the expense of the people  
2 who have been with me for years.

3 And as I say, if people do things  
4 with me and they make mistakes and they're not  
5 perfect. That's okay. That's life. That's how  
6 you create loyalty by people. When they're  
7 down, you help them and you forgive them and you  
8 let it go because everybody finds themselves in  
9 that situation. And that is -- so that's okay.

10 But she was always pushing for this,  
11 pushing for this. But I said okay, I'll listen.

12 Let me read the second part.

13 Q. Well, let me ask you a question  
14 about that part.

15 So Ms. Robinson is requesting a  
16 raise in 2018, right?

17 A. Yes.

18 Q. She wants --

19 A. She's comparing herself to Dan  
20 Harvey. She's comparing herself to Jane. I  
21 mean, that's ludicrous.

22 Q. All right.

23 I understand. I understand. I'm  
24 not asking about that.

25 A. She's getting paid pretty well,

1 little over three years ago. Say if it was last  
2 fall, that would be three years from last fall,  
3 I suppose, would be the time.

4 Q. Did Ms. Chen ever tell you that in  
5 her opinion, Ms. Robinson is a bitch?

6 A. Not that I remember, but she could  
7 have.

8 Q. Did Ms. Chen ever tell you that from  
9 her perspective, Ms. Robinson was hysterical?

10 A. She could have.

11 Q. Did Ms. Chen ever tell you from her  
12 perspective, Ms. Robinson was emotionally  
13 disturbed?

14 A. I'm not sure I would remember that,  
15 but, you know, it could be.

16 Q. Did Ms. Chen ever tell you that from  
17 her perspective, Ms. Robinson was crazy?

18 A. I don't know if -- I don't know. I  
19 don't remember.

20 Q. Did Ms. Chen ever tell you that from  
21 her perspective, Ms. Robinson was in love with  
22 you?

23 A. There was some talk about that.

24 Q. What was the talk?

25 A. That she thought that maybe she was

1 because of certain things she bought in the  
2 house and stuff like that and that she was so  
3 territorial about it.

4 And I never -- I mean, I was like  
5 dumbfounded. I just didn't even know how to  
6 react to that.

7 Q. Would you and Ms. Chen fight about  
8 that issue?

9 A. No.

10 Q. Did Ms. Chen ever tell you that from  
11 her perspective, Ms. Robinson wanted to be  
12 married to you?

13 A. I don't remember that.

14 Q. Did Ms. Chen ever tell you that from  
15 her perspective, Ms. Robinson wanted to move in  
16 with you?

17 A. Yes, there was a little of that  
18 wondering.

19 Q. What, to your best recollection, was  
20 said?

21 A. It was just that, that simple.

22 Q. That Ms. Robinson wanted to move in  
23 with you?

24 A. Yes.

25 Q. Did you ever think Ms. Robinson

1           A.     She wouldn't remind me. I knew.  
2     She would refill my medicine. She didn't do  
3     that. See, right now these are questions like  
4     she is a wife or something or my assistant. I  
5     don't know what this is. What this implies.  
6     But it is creepy.

7           Q.     Ms. Robinson would routinely  
8     communicate with your doctors; wouldn't she?

9           A.     No.

10                   MR. DROGIN: Objection to the  
11                   form.

12     BY MR. SANFORD:

13           Q.     Ms. Robinson would arrange furniture  
14     deliveries for you; wouldn't she?

15           A.     That, yes, she would do.

16           Q.     Ms. Robinson would routinely arrange  
17     flower deliveries for you; wouldn't she?

18           A.     That, she could do.

19           Q.     Ms. Robinson would help organize and  
20     decorate parties for you; wouldn't she?

21           A.     That, she could do.

22           Q.     Ms. Robinson would arrange your  
23     travel via private jet; wouldn't she?

24           A.     That, she could do.

25           Q.     Ms. Robinson -- and when you say she

1 could do, she did do it, right?

2 A. She did.

3 Q. Ms. Robinson would routinely run  
4 errands for the Canal office and for you and  
5 your family; wouldn't she?

6 MR. BENNETT: Objection.

7 A. Yes.

8 BY MR. SANFORD:

9 Q. Ms. Robinson would RSVP to events on  
10 your behalf; wouldn't she?

11 A. Yes.

12 Q. Ms. Robinson would at times field  
13 media requests on your behalf; wouldn't she?

14 MR. BENNETT: Objection.

15 A. Yes.

16 BY MR. SANFORD:

17 Q. Ms. Robinson would generally remind  
18 you to pick out gifts; wouldn't she?

19 A. She could. Her job was to remind  
20 me. I say remind me, there's a list, I have to  
21 get these particular gifts for certain people  
22 for their birthday, for Christmas, whatever,  
23 yes.

24 Q. Ms. Robinson often accompanied you  
25 while you picked out gifts for family and close

1 familiar friends; wouldn't she?

2 MR. DROGIN: Objection to form.

3 A. Yes.

4 BY MR. SANFORD:

5 Q. Ms. Robinson would generally help  
6 manage your contacts list; wouldn't she?

7 MR. BENNETT: Objection.

8 A. Yes.

9 BY MR. SANFORD:

10 Q. Ms. Robinson would coordinate your  
11 award show votes; wouldn't she?

12 A. My award show what?

13 Q. Votes.

14 A. Well, help set it up for me and then  
15 I would do my own voting. It wasn't like she  
16 was part of.

17 Q. And by that, I mean the Oscar votes,  
18 right?

19 MR. BENNETT: Objection.

20 A. Yes, but that's in the computer.  
21 Not -- that's all she did.

22 BY MR. SANFORD:

23 Q. Ms. Robinson would often look up  
24 restaurants for you; wouldn't she?

25 A. Yes.

1 Q. I'm sorry?

2 A. Yes, she did.

3 Q. Ms. Robinson would vet vacation  
4 rentals for you; wouldn't she?

5 A. Yes, she did.

6 Q. Ms. Robinson vetted home rentals for  
7 you; wouldn't she?

8 A. Yes, she did.

9 Q. Ms. Robinson researched potential  
10 schools for your son; didn't she?

11 A. She might have done some, yes.

12 Q. Ms. Robinson assisted with your  
13 pets; didn't she?

14 A. She might have.

15 Q. When you say might have, you're  
16 saying "yes"?

17 A. I don't know because I have pets.  
18 We had pets. Tiffany had pets. I don't know.  
19 That was the overlap. So I don't know.

20 Q. Ms. Robinson scouted hotels all over  
21 the world for you; didn't she?

22 A. Not all -- wherever I had to go on  
23 location she did go. I trusted her to go do  
24 that.

25 Q. Ms. Robinson researched options for



1 the purchase of your bed; didn't she?

2 A. The purchase of my bed? Yes. My  
3 furniture. All my furniture, yes.

4 Q. Ms. Robinson helped buy furnishings  
5 for your home; didn't she?

6 A. She did, yes.

7 Q. Ms. Robinson vetted housekeepers for  
8 you; didn't she?

9 A. Yes.

10 Q. Ms. Robinson researched options for  
11 planters and pots for your plants; didn't she?

12 A. Yes.

13 Q. Ms. Robinson assisted with the  
14 delivery of your plants; didn't she?

15 A. Yes.

16 Q. Ms. Robinson went plant shopping  
17 with you; didn't she?

18 A. Yes, yes.

19 Q. Ms. Robinson went antique shopping  
20 with you?

21 A. Yes, she did.

22 THE VIDEOGRAPHER: The time is  
23 12:41. We are going off the record for  
24 technical reasons.

25 (Whereupon, at 12:41 o'clock

1 that and my children resented her doing that.  
2 Trying to, you know.

3 Q. You had Ms. Robinson coordinate your  
4 schedule so that you could spend time with your  
5 children over spring break; didn't you?

6 A. Yes, she coordinated all of that  
7 stuff, yes.

8 Q. You had Ms. Robinson assist with  
9 various items related to your former partner  
10 [REDACTED], didn't you?

11 A. Say that again.

12 Q. You had Ms. Robinson assist with  
13 various things related to your former partner?

14 A. There was a point that she did that  
15 briefly and that was it.

16 Q. What point was that?

17 A. Somewhere a couple years ago where  
18 she was -- I asked her and Robin to do  
19 something, but it didn't go very long.

20 Q. What did you ask Ms. Robinson to do  
21 with respect to --

22 A. To help her with certain things.  
23 Just it didn't --

24 Q. And this was about 2018, 2019,  
25 correct?

1 say she could have. So that's it.

2 Q. Well, you don't dispute that Ms.  
3 Robinson collected evidence to help you in your  
4 divorce, right?

5 A. Yes, I think she did. I'll say that  
6 like that.

7 Q. All right.

8 You asked Ms. Robinson to  
9 communicate with your divorce attorney; didn't  
10 you?

11 A. I might have.

12 Q. Is that a "yes"?

13 A. That's all I can say, is I might  
14 have. You have the e-mails, so you have them.  
15 So you know.

16 Q. On two occasions you asked Ms.  
17 Robinson to accompany you to the emergency room,  
18 didn't you?

19 A. Yes.

20 Q. Ms. Robinson on several occasions  
21 accompanied you to doctors; didn't she?

22 A. Yes. I went to the emergency room  
23 and maybe another doctor. I can't remember  
24 specifically, yes.

25 Q. So a significant part of Ms.

1 BY MR. SANFORD:

2 Q. So, there's -- Ms. Chen writes in  
3 part that, you know, what is happening here is  
4 manipulative and nasty.

5 What do you understand to be  
6 manipulative?

7 A. Just, it is just what she was doing.  
8 She was not responding. I think you have a  
9 better answer. I was not aware of this stuff  
10 and the minutia of it and so on. I just don't  
11 even remember. She just was not in general, not  
12 doing what was right, Chase.

13 Q. What was nasty?

14 A. I don't know. Tiffany told you. I  
15 don't remember. She told you. I know you have  
16 all these answers. So you have it.

17 Q. Did you ever tell Ms. Chen not to  
18 refer to Ms. Robinson as a bitch?

19 A. No. I didn't say anything.

20 Q. When you saw this in an e-mail and  
21 I'm quoting here "This bitch needs to get put in  
22 her fucking place," how did you react?

23 A. I saw that she was upset, you know.

24 Q. Did you ever, did you ever  
25 communicate with Ms. Chen about being respectful

1 towards Ms. Robinson?

2 MR. BENNETT: Objection.

3 A. Mr. Chen didn't have to. She told  
4 me how disrespectful she was. And everybody  
5 knew that. Chase had a reputation among not  
6 just with the way she treated Tiffany, but the  
7 way she treated everybody. They all hated her.  
8 She thought she was being nice or take them to  
9 dinner on my dime at Nobu. I said fine. And  
10 stuff like that. But she was -- they hated her.  
11 They all rejoiced when she left. I had no idea  
12 that this was all going on.

13 BY MR. SANFORD:

14 Q. Well, when you read Ms. Chen's  
15 e-mail to you when she writes "This bitch needs  
16 to get put in her fucking place," did you agree  
17 with that?

18 A. No, no, I'm just listening. I'm  
19 just saying "Oh, here we go". Now I've got to  
20 see what I'm going to talk to Chase. I don't  
21 know. I might have said something to Chase.  
22 Maybe and maybe she should stay away from the  
23 house and I think that's what we finally agreed  
24 to.

25 Q. Do you think Ms. Chen was jealous of

1                   And she could have said at any time  
2     "Listen, I can't do that. Can we give it to  
3     Jillian or this person or that or Sabrina". I  
4     think she was trying to control everything and  
5     it was really hard.

6                   Q. Can you think of any other good  
7     things that Ms. Robinson did that you valued?

8                   MR. DROGIN: Objection to the  
9     form.

10                  A. Well, she kept telling me all the  
11     good things she did and all the hard work she  
12     did. And she was available to me when I needed  
13     or I told her I needed this and she did these  
14     things. So, yes, I mean, she was good in many  
15     ways. I can't think offhand, but she would do  
16     what I asked her to do and I guess but a lot of  
17     other people weren't feeling that way. And I  
18     don't know. I don't know how she interacts at  
19     the office. I know I don't want to get in this  
20     situation ever again.

21     BY MR. SANFORD:

22                  Q. Okay.

23                         I'm sharing a document with you in  
24     the chat.

25                  A. I would like to make sure that

1 BY MR. SANFORD:

2 Q. Mr. De Niro, have you had an  
3 opportunity to review what's been marked as  
4 Exhibit 121?

5 A. Yes, I did.

6 Q. What is that Exhibit 121?

7 A. I did. Yes, I did.

8 Q. Okay.

9 And what is the document you  
10 reviewed?

11 A. It is the one where I say to Chase  
12 "That's fine. Certain things have to be  
13 finished out. I want as little as possible done  
14 by you. That certain things might just have to  
15 be resolved and only by you. You'll be let  
16 known what they are. Thanks, Bob".

17 She goes on with the e-mail she sent  
18 the other time.

19 Q. Okay.

20 And Ms. Robinson was never informed  
21 of what she needed to do to facilitate the  
22 transition; isn't that right?

23 A. Well, that only might have been  
24 because she started other things that put me on  
25 the defensive and I didn't know what to do and I

1 also, like as knowing that she had taken things  
2 like air miles and other things, things were  
3 missing. And now, this is something else. I  
4 was surprised, frankly, to hear that.

5 If anything, I thought she would  
6 just be honorable, correct. Do the right thing.  
7 None of this would -- disputes happen with  
8 people. That's okay. That's life. But to take  
9 because you think you're entitled to it. I gave  
10 you enough -- when we talked, I gave you, I said  
11 the 60 or 80 or 70,000 for the next few months  
12 after -- through the holidays to help me is one  
13 thing. I don't remember guaranteeing her two  
14 years for that. I just don't remember doing  
15 that. I wouldn't do that.

16 Q. As far as you know, no one at Canal  
17 ever reached out to Ms. Robinson to coordinate  
18 the logistics of the transition, right?

19 A. No, but I knew there was going to be  
20 legal problems. I did sense that and I told Tom  
21 "I have a feeling we're going to have a problem,  
22 but let's just see. Hopefully it works out  
23 nicely and there's no problem". I don't want to  
24 have problems. I don't want to go through all  
25 this.



## ERRATA SHEET

	PAGE	LINE#	CHANGE	REASON
1				
2				
3				
4	<u>91</u>	<u>1</u>	insert "would" after "they"	Clarification
5	<u>132</u>	<u>8</u>	Change "allusion" to "illusion"	Transcription error
6	<u>189</u>	<u>3</u>	change "Mr." to "Ms."	Transcription error
7	<u>214</u>	<u>7</u>	insert "and" before "Hackett"	Clarification
8	<u>229</u>	<u>18</u>	Change "prindpal" to "principle"	Incorrect word
9	<u>339</u>	<u>16</u>	Change "phone number" to "credit card number"	Clarification
10	<u>342</u>	<u>8</u>	Change "phone number" to "credit card number"	Clarification
11	<u>352</u>	<u>24</u>	Change "Montague" to "Montage"	Transcription error
12	<u>353</u>	<u>1</u>	Change "Montague" to "Montage"	Transcription error
13	<u>386</u>	<u>20</u>	Change to "That <del>she</del> she can abuse it? No."	Transcription error
14	<u>420</u>	<u>2</u>	insert "her" instead of "the"	Transcription error
15	<u>422</u>	<u>11</u>	insert "was" before "just"	Clarification
16	<u>427</u>	<u>17</u>	insert "say" after "can"	Clarification
17	<u>224</u>	<u>1</u>	Change "Samuel Hevn"	Correction of
18			to "Sandy O'Heaven"	name
19				
20				
21				
22				
23				
24				
25				



SIGNATURE PAGE  
OF  
ROBERT DE NIRO

I hereby acknowledge that I have read the foregoing deposition, dated April 4, 2022, and that the same is a true and correct transcription of the answers given by me to the questions propounded, except for the changes, if any, noted on the attached errata sheet.

SIGNATURE: \_\_\_\_\_

WITNESSED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

THOMAS A. HARVEY  
Notary Public, State of New York  
No. 02HA6051878  
Qualified in Westchester County  
Commission Expires December 4, 2022

**MAGNA** 